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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91222181
Party	Defendant Image API, LLC
Correspondence Address	AMY E. CARROLL DRINKER BIDDLE & REATH LLP 1500 K ST NW STE 1100 WASHINGTON, DC 20005-1209 dctrademarks@dbr.com
Submission	Answer
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Date	07/13/2015
Attachments	Axiom Global Inc. v. Image API LLC - Opp. 91222181.pdf(125818 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Opposed Application Ser. No. 86/203,593
Mark: AXIOM PRO

Axiom Global Inc. d/b/a Axiom

Opposer,

Opposition No. 91222181

v.

Image API, LLC

Applicant.

ANSWER

Image API, LLC (“Applicant”) without waiving any right due to any insufficiency in the statement of the grounds of opposition, and saving to itself all defenses in law and equity, in answer to the Notice of Opposition (the “Opposition”) filed by Axiom Global Inc. d/b/a Axiom (“Opposer”), hereby responds as follows to the correspondingly numbered paragraphs of the Opposition:

1. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegation in paragraph 1 of the Opposition and, accordingly, denies the same.
2. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 2 of the Opposition and, accordingly, denies the same.
3. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 3 of the Opposition and, accordingly, denies the same.
4. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 4 of the Opposition and, accordingly, denies the same.

5. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 5 of the Opposition and, accordingly, denies the same.

6. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 6 of the Opposition and, accordingly, denies the same.

6. Applicant admits the allegations in the second numbered paragraph 6 in the Opposition, which should have been numbered as paragraph 7.

7. Admitted. Applicant notes that paragraph 8 of the Opposition is incorrectly numbered as paragraph 7.

8. Denied. Applicant notes that paragraph 9 of the Opposition is incorrectly numbered as paragraph 8.

9. Denied. Applicant notes that paragraph 10 of the Opposition is incorrectly numbered as paragraph 9.

10. Denied. Applicant notes that paragraph 11 of the Opposition is incorrectly numbered as paragraph 10.

11. Denied. Applicant notes that paragraph 12 of the Opposition is incorrectly numbered as paragraph 11.

For the foregoing reasons, Applicant prays that this opposition proceeding be dismissed with prejudice; and that it be accorded such further relief as provided for by law and the rules of practice in trademark cases.

Respectfully submitted,

Image API, LLC

Date: July 13, 2015

By:



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Counsel for Applicant

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing ANSWER has been served upon counsel for Opposer at the following address of record by first class mail, postage prepaid, this 13th day of July 2015:

Gallit Schuller, Esq.
Axiom Global d/b/a Axiom
295 Lafayette Street, 7th Floor
New York, NY 10024

Deborah C. Clark